

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON INC.,
PEVLIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL No. 2327

JUDGE GOODWIN

This Document Relates to all Cases

**APPLICATION FOR APPOINTMENT OF ALYSON OLIVER
TO SERVE ON PLAINTIFFS' STEERING COMMITTEE**

Alyson Oliver respectfully files this application for appointment to the Plaintiffs' Steering Committee ("PSC"). I have reviewed the Proposed Counsel Structure Plan filed with the Court for MDL 2325, 2326, and 2327 on March 19, 2012, and join in the recommendation that the plan be accepted with one alteration: that I am included in the PSC. The recommendation does include multiple appointments of attorneys from various firms and while I am personally not opposed to the duplicate appointments, if the Court is concerned about the size of the PSC, only then should duplicate appointments per firm be eliminated to allow for appointment of other interested qualified counsel such as myself. I respectfully submit that I possess the qualifications set forth by the Court for membership in the PSC, that I have the requisite experience and resources to serve on Plaintiff's Steering Committee, and I commit to this challenging and expansive MDL process.

I am the managing shareholder of the Oliver Law Group PC (hereinafter "OLG") in Rochester, Michigan; the Chair of OLG's pharmaceutical and medical device product liability litigation division; and a member of the Top 100 Trial Lawyers for 2008, 2009, 2010, 2011 and 2012. OLG currently is retained on over 300 cases involving personal injuries suffered as a result of implanted transvaginal surgical mesh products, are in the process of reviewing approximately 1200 more, and expect to receive and investigate many more as time progresses. OLG currently represents Plaintiff in *Leon, et al. v. Ethicon Inc.*, et al (NJ.; Docket No 3:12-cv-01900), Plaintiffs in each of the other consolidated matters as set forth in the application filed in each respectively, and intends to file many cases involving the same Defendants in this Court.

I have been practicing law for nearly 14 years, and have been appointed to serve as a PSC member in the *Zimmer Nexgen Knee Implant Products Liability Litigation* (1:11-cv-05468, N.D. IL.). I have extensively tried cases for years, averaging approximately 11 trials per year to verdict with a 90% win ratio. I have substantial MDL-related mass tort products liability experience representing thousands of injured clients. I have represented clients in virtually every current mass tort products liability MDL including litigations concerning *Heparin*; *Digitek*; *DePuy ASR Hip Implant*; *DePuy Pinnacle Hip Implant*; *Yaz/Yasmin/Ocella*; *Denture Cream*, *Mirapex*, *Kugel Mesh*, *Medtronic Sprint Fidelis*, *Imprelis Herbicide Litigation* and *Actos*. I have attended the Joint Panel on Multi-District Litigation (JPML) hearings on most of these matters and, have collaborated with co-counsel regarding presentment of cases for consolidation, and have been honored by being able to present before the panel numerous times . Indeed, in this case at the JPML hearing I was one of five counsel (Bryan Aylstock, Henry Garrard, Fred Thompson, Amy Eskin and myself, Alyson Oliver) who advocated in Miami for consolidation of these matters and for assignment before Your Honor and achieved the JPML Order creating this litigation.

Throughout the past many years, I have earned a reputation of working well with fellow plaintiff's counsel as well as with defense counsel and the Court, thereby leading to efficiencies for all participants. I have worked diligently to develop significant working relationships with many of the proposed PSC members in this matter, including but not limited to Bryan Aylstock, Tom Anapol, Richard Arsenault, Ben Anderson, Erin Copeland, Yvonne Flaherty, Pete Flowers, Michael Goetz, Stacy Hauer, Rick Meadow, Doug Monsour, Joe Osborne, Wendy Fleishman, Stacy Hauer, Victoria Maniatis, Mike Miller, Dianne Nast, Jerry Parker and Hunter Shkolnik and look forward to working together with other proposed members as well.

OLG has the requisite resources to aid this litigation and will commit every resource required to enable this Court to expeditiously move the MDL through discovery and toward trial and/or early resolution – steps we have already undertaken by devoting substantial financial resources and dedicating a team of attorneys and staff to this litigation. Since July, 2011 I have been heavily involved in this litigation, investing significant time and resources, and we have a significant interest in participating in

these consolidated proceedings as a member of the Plaintiffs' Steering Committee. We have a team of attorneys and staff that have dedicated themselves to interviewing hundreds of women injured by these products, conducting due diligence reviews of our clients' cases, researching FDA documents and medical literature and vetting experts. I have engaged in weekly conference calls and organizational meetings as well. I attended multiple conferences with other attorneys to discuss these issues and this litigation and I have presented at the Harris Martin Conferences in Savannah, Georgia on the issue of Transvaginal Mesh Science.

In summary, I am committed to this litigation not only on behalf of my clients, but on behalf of the enormity of female issues raised herein for all of the litigants and a personal commitment to justice under these circumstances. My firm has more than sufficient resources that would benefit the PSC. It would be an honor to serve. It is with sincere appreciation of the obligations and responsibilities involved in taking on this role, I respectfully request that the Court favorably consider this application for appointment as a member of the Plaintiffs Steering Committee.

March 30, 2012

Respectfully Submitted,

/s/Alyson Oliver
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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

March 30, 2012

Respectfully Submitted,

/s/Alyson Oliver
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EXHIBIT A

United States District Court
Eastern District of Michigan

CERTIFICATE OF GOOD STANDING

I, David J. Weaver, Clerk of Court, certify that

Alyson Oliver

*was duly admitted to practice in this Court on 05/08/2001,
and is in good standing as a member of the Bar of this Court.*

Dated at Detroit, Michigan on 02/08/2012.

David J. Weaver
Clerk

